



SACRAMENTO COUNTY  
**WATER AGENCY**

Including service to the Cities of  
Elk Grove and Rancho Cordova

October 6, 2010

Kathy Cole Harder  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114

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CVRWQCB  
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Dear Ms. Harder:

The Sacramento County Water Agency (SCWA) appreciates the opportunity to comment on the Draft Discharge Permit (Draft Permit) issued to the Sacramento Regional County Sanitation District (SRCSD) for the Regional Wastewater Treatment Plant (Treatment Plant). SCWA is a water purveyor within Sacramento County, providing domestic water service to approximately 50,000 customers. As a water purveyor that delivers both surface and ground water to its customers, SCWA recognizes the value of the Sacramento area's water resources and the need for effective and efficient environmental regulation to protect those resources.

Over the last few years, the State of California has invested significant effort legislatively in attempting to solve the State's water crisis, and a large focus of this effort has been expended on attempts to improve the condition of the Sacramento-San Joaquin Delta (Delta). It is universally agreed that the Delta is an important economic and environmental resource that benefits virtually all of California. The Delta provides agricultural and municipal water for two-thirds of the State's population and is a unique ecosystem that provides crucial habitat for important species. The cost to improve conditions in the Delta will be significant, and it is crucial, as the State's plan is developed, to do a cost/benefit analysis of all of the alternatives to ensure that public funds are spent wisely and efficiently.

The State relies on various agencies, such as the State and Regional Water Boards, to help define and implement policy to carry out the Delta solution. The Draft Permit issued by the Central Valley Regional Water Quality Control Board is one of the mechanisms selected, and it mandates that nearly all ammonia be removed from SRCSD effluent prior to discharge. To do this, additional treatment processes must be incorporated into the SRCSD treatment at an estimated capital cost of over \$2 billion with \$77 million in annual maintenance costs. One objective of the Central Valley Regional Water Quality Control Board is to ensure that this investment will provide a commensurate level of benefit to the Delta. Another objective must be

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to ensure that science supports the Draft Permit's findings and that these funds couldn't be used in other ways with greater success to improve conditions in the Delta. SCWA is unsure that either of these objectives are met with this Draft Permit.

The Draft Permit's requirement for ammonia removal and microfiltration exceeds the level of treatment required elsewhere in the state, and it goes beyond what is "reasonable and necessary," as required in the Clean Water Act. It appears that this requirement is being promulgated only to enhance the ability to increase water exports from the Delta. This Draft Permit is part of the State's Delta solution, and for this reason implementation costs should not be borne solely by those in the Sacramento area. As such, these costs to improve the Delta should be borne by all Californians because nearly all will benefit from it.

Thank you again for the opportunity to comment. If you have questions on the comments provided, please contact Kerry Schmitz at (916) 874-4681.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith DeVore", with a stylized flourish at the end.

Keith DeVore, Director

KD/ks:sa